

United States District Court
Middle District of Pennsylvania

Jasmine Malseed,)
)
Plaintiff,)
)
v.) Docket No. 1:23-cv-01329-CCC
)
Penbrook Borough, et al.)
)
Defendants.)

**Joint Motion for Stay of All Deadlines
Pending Completion of Settlement Negotiations**

The parties have agreed to renew settlement negotiations in this matter. To maximize the prospects for a potential settlement by avoiding additional attorney's fees and expenses, the parties jointly request that the Court stay all other proceedings and deadlines pending the outcome of those negotiations. The reasons for this motion are as follows:

1. The parties have completed substantial discovery in this case, including the depositions of all but one of the named parties.
2. The parties decided at this juncture to renew settlement negotiations before addressing final discovery issues and moving on to the next steps in this litigation.

3. In order “to secure the just, speedy, and inexpensive determination of [this] action,” Fed. R. Civ. P. 1, the parties request that the Court stay all pending discovery-related deadlines and Court-ordered deadlines (including the deadlines in the Court’s Scheduling Order (ECF No. 84) and the recent order regarding Susquehanna Township’s motion to dismiss (ECF No. 95)) until the conclusion of the settlement negotiations.

4. The parties will provide the Court with a joint status report no later than September 6, 2024, to update the Court on the status of the settlement negotiations and inform the Court whether the stay should be lifted.

Because good cause has been shown, the parties respectfully request that the Court stay all pending deadlines in this case.

Date: August 9, 2024

Respectfully submitted,

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Certificate of Service

I hereby certify that on August 9, 2024, I electronically filed this filing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Date: August 9, 2024

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